

Quinn,Robert E

From: Quinn,Robert E
Sent: Thursday, July 25, 2019 11:31 AM
To: 'Darius Charney'
Cc: Claudia Wilner; Travis England
Subject: RE: Activity in Case 1:18-cv-00719-CCR Black Love Resists et al v. City of Buffalo et al Motion to Compel

Ok, I'll respond further after going through everything in your papers. I guess just note my objection to the way this was handled and also that we may have to adjust how discovery/communication is handled going forward because we are apparently not on the same page/level. Thanks.

-Rob Quinn.

From: Darius Charney [mailto:dcharney@ccrjustice.org]
Sent: Thursday, July 25, 2019 11:15 AM
To: Quinn,Robert E <rquinn@ch.ci.buffalo.ny.us>
Cc: Claudia Wilner <wilner@nclej.org>; Travis England <england@nclej.org>
Subject: Re: Activity in Case 1:18-cv-00719-CCR Black Love Resists et al v. City of Buffalo et al Motion to Compel

Rob-

We discussed all of the issues raised in the motion with you by phone and over email exhaustively over the past several months, including several times within the past month, and we have clearly reached an impasse. All of those conversations, and the nature of the parties' outstanding disputes, are documented in detail in the motion papers.

Darius

On Thu, Jul 25, 2019 at 10:29 AM Quinn,Robert E <rquinn@ch.ci.buffalo.ny.us> wrote:

My understanding of the meet and confer is to discuss and try to work through outstanding discovery issues so that motions can be avoided. I would have expected these issues to be presented as such. Also, I'm at a loss as to why it wouldn't have come up as a practical and cooperative matter, but maybe I misunderstood what we were trying to accomplish. Thanks.

-Rob Quinn.

From: Claudia Wilner [mailto:wilner@nclej.org]
Sent: Thursday, July 25, 2019 10:08 AM
To: Quinn,Robert E <rquinn@ch.ci.buffalo.ny.us>; Darius Charney <dcharney@ccrjustice.org>
Cc: Travis England <england@nclej.org>
Subject: Re: Activity in Case 1:18-cv-00719-CCR Black Love Resists et al v. City of Buffalo et al Motion to Compel

Rob, the IA complaint issues are not included in the motion. We have already discussed the issues raised in the motion, such as your failure to produce ESI, many times.

From: Quinn, Robert E <rquinn@ch.ci.buffalo.ny.us>
Sent: Thursday, July 25, 2019 7:55 AM
To: Claudia Wilner <wilner@nclej.org>; Darius Charney <dcharney@ccrjustice.org>
Cc: Travis England <england@nclej.org>
Subject: FW: Activity in Case 1:18-cv-00719-CCR Black Love Resists et al v. City of Buffalo et al Motion to Compel

I am surprised this was not discussed in our confer on Thursday or the subsequent emails communications. Thanks.

-Rob Quinn.

From: webmaster@nywd.uscourts.gov [<mailto:webmaster@nywd.uscourts.gov>]
Sent: Wednesday, July 24, 2019 11:28 PM
To: Courtmail@nywd.uscourts.gov
Subject: Activity in Case 1:18-cv-00719-CCR Black Love Resists et al v. City of Buffalo et al Motion to Compel

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U.S. DISTRICT COURT

U.S. District Court, Western District of New York

Notice of Electronic Filing

The following transaction was entered by Wilner, Claudia on 7/24/2019 at 11:27 PM EDT and filed on 7/24/2019

Case Name: Black Love Resists et al v. City of Buffalo et al
Case Number: 1:18-cv-00719-CCR
Filer: Black Love Resists in the Rust
Jane Doe
Dorethea Franklin
De'Jon Hall
Taniqua Simmons

Document Number: 34

Docket Text:

MOTION to Compel Defendants to Comply with May 30, 2019 Discovery Order and Other Discovery Obligations by Black Love Resists in the Rust, Jane Doe, Dorethea Franklin, De'Jon Hall, Taniqua Simmons. (Attachments: # (1) Memorandum in Support of Motion to Compel, # (2) Declaration in support of Motion to Compel, # (3) Exhibit A - Supp Response to First RFPs, # (4) Exhibit B - Response to Second RFPs, # (5) Exhibit C - Interrogatories (excerpt), # (6) Exhibit D - Supp Response to Interrogatories (excerpt), # (7) Exhibit E - 11.15 email, # (8) Exhibit F - 1.3 email, # (9) Exhibit G - 1.18 letter, # (10) Exhibit H - 1.21 email, # (11) Exhibit I - 1.28 email, # (12) Exhibit J - 2.4-12 email chain, # (13) Exhibit K - 2.27 email, # (14) Exhibit L - 3.6 email, # (15) Exhibit M - 3.18 letter, # (16) Exhibit N - 3.25 email & attachments, # (17) Exhibit O - 5.6 email, # (18) Exhibit P - 6.5 email, # (19) Exhibit Q - 6.6-11 email chain, # (20) Exhibit R - 6.20 letter, # (21) Exhibit S - 6.21 email, # (22) Exhibit T - 6.27-7.9 email chain, # (23) Exhibit U - 7.3-8 email chain, # (24) Exhibit V - Housing Unit Monthly Report)(Wilner, Claudia)

1:18-cv-00719-CCR Notice has been electronically mailed to:

Andrea Chinyere Ezie cezie@ccrjustice.org, chinyere.ezie@gmail.com

Baher Azmy bazmy@ccrjustice.org

Claudia Wilner wilner@nclej.org, peeples@nclej.org

Darius Charney dcharney@ccrjustice.org

Edward Krugman krugman@nclej.org

Joseph A. Kelemen jkelemen@wnylc.com

Keisha Alecia Williams kwilliams@wnylc.com

Marc Cohan cohan@nclej.org

Robert Emmet Quinn rquinn@city-buffalo.com, cmiller@city-buffalo.com, dlee@city-buffalo.com, LawMaster@city-buffalo.com, ssstrom@city-buffalo.com, tball@city-buffalo.com

1:18-cv-00719-CCR Notice has been delivered by other means to:

Britney Wilson
Center for Constitutional Rights
666 Broadway Floor 7
New York, NY 10012

Travis W. England
National Center for Law and Economic Justice
275 7th Avenue
Suite 1506
New York, NY 10001

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-0]
] [ab040f69222a46278693d7d63e223b098e0d13eab51ea4c9963e943f0ad959855d7
38a4b3a5a44b099a3eb813b04f469f85ac1f33fe8b2efbc824bd1073a44b7]]

Document description:Memorandum in Support of Motion to Compel

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-1]
] [c1473b9573411fc63f2056cd010f4bec91a38455192c3db6bac40826ae77680c74c
73050f5996fae57f5369dc6b9982104668265a151301a490817062c6eb2ef]]

Document description:Declaration in support of Motion to Compel

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-2]
] [475bde8aea8a35567dbb068ee9f5a3f06a37c564ad80f39ef68a89b74eac783e5c4
83103f0067728abfbbe6fbac827f43914ba003081efdc4cf94df6a73833c5]]

Document description:Exhibit A - Supp Response to First RFPs

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-3]
] [c7dab3cf7795cf9de5b60517b064345414e7a5b1dbfcd6f586b83d3a9d9458391a3
0e4eca01a8031d67347819313c2a125936e135a0db92635cd5a869653b907]]

Document description:Exhibit B - Response to Second RFPs

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-4]
] [8aa7f9e58b589b99299aff018b99297499527d17ce15b0d85a2edbe0f00c9e521f3
b548606495ffad1bcf8ec1f542c5277a5617b3166b7fd0491f5054f955ee7]]

Document description:Exhibit C - Interrogatories (excerpt)

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-5]
] [4018984239e5824e373c35bcd5f0843d2617b65ad7409ab98da75beb8a8c4c581df
708e97473f0e169b60fdc4fbdbe41b2abd0f4548774c91a78fddacf953859]]

Document description:Exhibit D - Supp Response to Interrogatories (excerpt)

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-6]
] [e2a42d8ddec40d9976b83e23dc6fa1030c60343d50ec807452f05f62e8dbe25ee36
151d0b3e7219509ef5d1c65196925e7ea407c1efd543f86199614f82229a6]]

Document description:Exhibit E - 11.15 email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-7]
] [045d160ddbbbc9e0f4512f4cc6c09f52a4536d53fca3ebb7a07be6474f2d0e4701a
2a1bfb55601b6281c0236939aa105ed73687cbc77b9e58df13a6c90689180]]

Document description:Exhibit F - 1.3 email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-8]
] [2c239d58cf29275c1a409c74b954658d063f4f694e5b009145d08ca4cd009fa0674
f571e99079a8177c33f891e33919d4add7ecb09cd64af4d6218b6e8a956d0]]

Document description:Exhibit G - 1.18 letter

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-9]
] [56698eb2f4596117596ca4383e44a5bef547cae6ca5c2cc79e96237ffce3d2e1c86
ffb4d7812a52e644f3cfb7293f5b90b9a9d3e06e99ac1ee517cba90d33cb7]]

Document description:Exhibit H - 1.21 email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-1
0] [2a9e6ed286224baa7c96e0f77ada4f7e1556d1b583192449e7e6aaf404c70c087c
4a014d1eb0e88a37cc972444fd63e6f28a9f751ee4e88fede14ee7b303d9cd]]

Document description:Exhibit I - 1.28 email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-1
1] [5753806c28ddb55ef132752f8637817a847de64b0816d54f220f59391ac8ddd669
7302ce3169ac96de54d0c714d92d0648def3f4e5756bf2df26c067f4e7328a]]

Document description:Exhibit J - 2.4-12 email chain

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-1
2] [61e125afce01ddb22918f1c6c3b7f7d60b81628a93a33ddbf81fb1db05ef62165d
4d5b9a51e901acd2646e935ee156b3e02990e19f78285cfede91c232e122f6]]

Document description:Exhibit K - 2.27 email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-1
3] [a6609c31753a8f4bdd912442ebec575bcbac7249243acc2351ae63105f09dacdf0
baa83fc1dc57f6b1c4b1cb42650872efde859e496bacf3cac9aafcdb46b7b9]]

Document description:Exhibit L - 3.6 email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-14] [0dc547c7d1c9dc7b872afc7ee872d8f5ea8980df05411c68f79012d02125f02e70b01b67fd82dfe65af688fae19683a313e89500fba8f04df5af6dc24b0e1683]]

Document description:Exhibit M - 3.18 letter

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-15] [45d09ae4b3f97edde7f674ff74894100e1a690daa9c122c74247d6edaa7a39c84a591df2484ecd82fdc84c2dd5266496fcca1c72d12f3143a0d7d4c61b16bd2e]]

Document description:Exhibit N - 3.25 email & attachments

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-16] [7d2b88f327985b67dcecf96e4b38ef97623e391e2ff0bcc193e10bed8c20b565c08225d5098228a78e146b0d3231087cfd914a28b48f456d4b9a774d1ccb4df5]]

Document description:Exhibit O - 5.6 email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-17] [3623b1b767e9fc1897ebaccf2d1d0b8d9f206f0798ac9fd65d1104396a217ee9d551fb78c2c11cae143c248b22a59ddfb21198c745ee18585edc625b4de50ccf]]

Document description:Exhibit P - 6.5 email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-18] [9895fa98c3e9b780eb60d1d0e13dfd9dd63fff2eb140c5071e0be3864927f07fa174217b5b1de39828015667f61ea832114343d9aea1281a739114ceb14af1b9]]

Document description:Exhibit Q - 6.6-11 email chain

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-19] [0eedc4416feb0f645aaba245ce164845a56a472ded7c2afc8be7c998c07687bf8e8e1f530526b379b1bf7dfe9c671915159be54ced722a60e28375b5e4bc29ee]]

Document description:Exhibit R - 6.20 letter

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-20] [0d0ec355c30a2fe4966634e60b68451ce3a0911ec6d1d383da386216dbcb62c0bc9716a97c63f86f2b4f3e508bdb5316a7be4b375ea9bflc629988bbeecd84ae]]

Document description:Exhibit S - 6.21 email

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-21] [2b536ab2cb767f37f1a14442c4c8be9b8d5fa97c6f8cc8bb31826f75b8d69f50cf80c41b77ca400fcf206c4a25a30f5fa119f206cf3f6587592c9acfd8266e06]]

Document description:Exhibit T - 6.27-7.9 email chain

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-22] [4f5daeb80ca291bfd8f97b55d01f1732136de90fcd2cd40381baf73e52e57501bd42d77334969964e6f247578b0def769f0868e602d326e92eda017c96c76253]]

Document description:Exhibit U - 7.3-8 email chain

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-23] [d614aec3cc9d4aaa018eb989523ec2bcb7dc8a7c3ce2d2cb009e0e5ae3c784a2c68b5ddc41295d8bb441743ba7d721399c2b1adca0ae6fb1a6bc99c5b9ad1154]]

Document description:Exhibit V - Housing Unit Monthly Report

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1042579058 [Date=7/24/2019] [FileNumber=4206602-24] [15c761f61dc32950a68bcff8cd25e70268650bd949d67a3268d75fad7166829d9836277f42a5a7b0b1036b66d9460ee04cf43e5681bce5482d6cb30119ca5762]]